

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6309-CF-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

**MOTION FOR PERMISSION TO TRAVEL**

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida and travel to Atlantic City, New Jersey, and as grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a one hundred thousand dollar corporate surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to Atlantic City, New Jersey, for the purpose of spending the Easter holiday with his children.
5. That the Defendant desires to travel outside of the State of Florida for approximately Four (4) days beginning on or about April 12, 2001 and returning April 15, 2001.
6. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit 1.
7. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.
8. That prior to the Defendant's departure the Defendant will provide addresses and

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telephone numbers where he will be staying to Raul Sagaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida to Atlantic City, New Jersey.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has attempted to contact the opposing counsel, Assistant United States Attorney, Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and as of the filing of this motion, undersigned has not received a response.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 9 APRIL, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.  
Attorneys for DEFENDANT/CHIUSANO  
1000 South Federal Highway  
Suite 103  
Fort Lauderdale, Florida 33316  
Telephone: (954) 763-5504

By: 

DONALD R. SPADARO, ESQUIRE  
Florida Bar No.: 520341

**April 4, 2001**

**Departure Information  
For Bruce Julius Chiusano**

**Please be advised that I will depart for Atlantic City on April 12, 2001 at 1pm at Executive Jet Center, Ft. Lauderdale, Florida. I will be staying at the Sands Casino.**

**Arrival: 3pm Midlantic Jet Center, Atlantic City, NJ.**

**Departing- Sunday, April 15<sup>th</sup> at 2pm, Midlantic Jet Center.**

**Arrival: 4pm Executive Jet Center, Ft. Lauderdale.**